

Remarks:

Claims 1-777 were originally filed.

Claims 1-777 were previously objected to and applicant was required to select claims such that the total number of claims was no more than 75, including 6 independent claims.

In response to the above referenced objection to the claims, claims 2-49, 51-94, 96-141, 143-190, 192-337, 339-543, 545, 547, 549, 551-556, 558, 560, 562-575, 577-578, 580, 582, 584, 586, 588-594, 596, 598, 600-606, 608, 610, 612, 614-615, 617, 619, 621, 623, 625-644, 646, 648, 650, 652-653, 655, 657, 659, 661, 663-676, 678, 680, 682, 684, 686, 688, 690-691, 693, 695, 697, 699, 701-751, and 759-777 were canceled.

Also, in response to the above referenced objection to the claims, claims 1, 50, 95, 142, 191, 338, 544, 546, 548, 550, 557, 559, 561, 576, 579, 581, 583, 585, 587, 595, 597, 599, 607, 609, 611, 613, 616, 618, 620, 622, 624, 645, 647, 649, 651, 654, 656, 660, 662, 679, 681, 685, 689, 692, 694, 698, 700, and 752 were selected for prosecution and were amended.

The substance of the prior amendments to the claims are repeated in the present ~~Article 19 Amendment~~.

Claims 778-836 have now been added.

Consequently, 1, 50, 95, 142, 191, 338, 544, 546, 548, 550, 557, 559, 561, 576, 579, 581, 583, 585, 587, 595, 597, 599, 607, 609, 611, 613, 616, 618, 620, 622, 624, 645, 647, 649, 651, 654, 656, 658, 660, 662, 677, 679, 681, 683, 685, 687, 689, 692, 694, 696, 698, 700, 752-750 and 778-836 are now pending in the present application.

Substitute sheets 151-210 replace original sheets 151-274.

The Objection to The Original Set of Claims:

The Examiner objected to the number of claims originally filed in the present application and required that the number of pending claims be reduced to 75, including 6 independent claims. Accordingly, the present application has been amended to reduce the number of pending claims to 75, with 6 independent claims.

The Rejection of Claims 1, 13, 26, and 41 in View Of Rockower et al.:

Claims 1, 13, 26, and 41 were rejected as lacking novelty in view of Rockower et al. (U.S. 5,306,101). The Applicant respectfully traverses.

As an initial matter, the rejection of claims 13, 26, and 41 is now moot as these claims are no longer pending in the present application.

Rockower et al. discloses a cutting/expanding tool that includes a scoring wheel 22 for scoring the interior surface of a tubing, cutter wheels 25, 29, and 32, for cutting a tubing along a longitudinal direction to thereby split open the tubing, and an expander 15 for then

expanding open the cut longitudinal ends of the split open tubing. Rockower et al. does not disclose or suggest: radially expanding and plastically deforming the tubing, a locking device for locking the position of the tubing relative to the support member 12, or an actuator for displacing the expander 15 relative to the support member 12.

Claim 1, as amended, recites: An apparatus for radially expanding and plastically deforming an expandable tubular member, comprising:

- a support member;
- a cutting device for cutting the tubular member coupled to the support member;
- an expansion device for radially expanding and plastically deforming the tubular member coupled to the support member;
- a locking device for locking the position of the tubular member relative to the support member; and
- an actuator for displacing the expansion device relative to the support member;
- wherein the actuator comprises:
 - a first actuator for pulling the expansion device; and
 - a second actuator for pushing the expansion device.

Thus, Rockower et al. does not disclose or suggest the invention of claim 1, as amended.

The Rejection of Claims 50, 59-67, 69, 70 and 72 in View Of Trahan et al.:

Claims 50, 59-67, 69, 70 and 72 were rejected as lacking novelty in view of Trahan et al. (U.S. 6,325,148). The Applicant respectfully traverses.

As an initial matter, the rejection of claims 59-67, 69, 70 and 72 is now moot as these claims are no longer pending in the present application.

Trahan et al. discloses tools and methods for use with expandable tubulars that includes a piston assembly 215 for setting slips 200 and thereby locking the position of a tubular member 225 to a preexisting outer casing, and a rotary expansion device coupled to a support member. The piston assembly 215 includes lugs 230 that releasably engaged an exterior surface of the tubular member 225. Trahan et al. does not disclose or suggest: a locking device for locking the position of the tubular member 225 to the support member that includes locking elements for engaging an interior surface of the tubular member 225.

Claim 50, as amended, recites: An apparatus for radially expanding and plastically deforming an expandable tubular member, comprising:

- a support member;
- an expansion device for radially expanding and plastically deforming the tubular member coupled to the support member;
- an actuator coupled to the support member for displacing the expansion device

relative to the support member; and
a locking device for locking the position of the tubular member relative to the support
member comprising one or more locking elements for engaging an interior
surface of the expandable tubular member.

Thus, Trahan et al. does not disclose or suggest the invention of claim 50, as amended.

Claims 2-12, 14-25, 27-40, 42-49, 51-58, 68, 71, and 73-75:

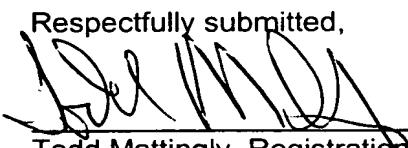
The Written Opinion indicated that each of claims 2-12, 14-25, 27-40, 42-49, 51-58, 68, 71, and 73-75, as originally filed, meet the criteria in PCT Article 33(2)-(3).

Accordingly, the following claims have been added which correspond to the indicated original claims:

Original Claims	New Claims
2-12	778-788
14	789
15	790
16-20	791-795
21-25	796-800
27-32	801-806
33-39	807-813
40	814
41-49	815-823
51-58	824-831
68	832
71	833
73-75	834-836

Thus, as indicated in the Written Opinion, each of claims 778-836 meet the criteria in PCT Article 33(2)-(3).

Respectfully submitted,



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